

FINDING OF NO SIGNIFICANT IMPACT (FONSI)

INSTALLATION DEVELOPMENT AT NELLIS AIR FORCE BASE

Pursuant to provisions of the National Environmental Policy Act (NEPA), Title 42 *United States Code* (U.S.C.) § 4321 et seq.; Council on Environmental Quality (CEQ) Regulations at 40 *Code of Federal Regulations* (CFR) Parts 1500–1508; and 32 CFR Part 989, *Environmental Impact Analysis Process (EIAP)*, the United States (U.S.) Air Force (Air Force) prepared the attached Final Environmental Assessment (EA) to address the potential environmental consequences associated with construction, renovation, infrastructure, and demolition projects at Nellis Air Force Base (AFB) in Nevada.

Purpose and Need

The purpose of the Proposed Action is to support Nellis AFB's future mission and training requirements and the arrival of next-generation aircraft. The construction of new facilities, renovations and repair of existing facilities, implementation of infrastructure improvements (such as roads, utility lines, and sanitation), and demolition of obsolete facilities will address deficiencies in existing facility and infrastructure at Nellis AFB. Left unchecked, deficiencies in facilities and infrastructure at Nellis AFB would degrade the ability of the Base to meet Air Force and U.S. Department of Defense (DoD) current and future mission requirements relative to state and federal requirements.

Nellis AFB needs to provide facilities and infrastructure that are adequate to meet the mission requirements of the 99th Air Base Wing (99 ABW) and its tenant units in a manner that:

- Meets all applicable DoD installation master planning criteria, consistent with Unified Facilities Criteria (UFC) 2-100-01, *Installation Master Planning* (30 Sept 2020); Department of the Air Force Manual (DAFMAN) 32-1084, *Standard Facility Requirements* (1 April 2018); Air Force Instruction (AFI) 32-1015, *Integrated Installation Planning* (as amended 4 Jan 2021); and Air Force Policy Directive 32-10, *Installations and Facilities* (20 July 2020);
- Meets applicable DoD antiterrorism and force protection criteria, consistent with UFC 4-010-01, DoD Minimum Antiterrorism Standards for Buildings (12 Dec 2018), and the Air Force Installation Force Protection Guide (1 Jan 1996);
- Supports and enhances the morale and welfare of personnel assigned to the Base, their families, and civilian staff, consistent with DoD Instruction 1015.10, *Military Morale, Welfare, and Recreation Programs* (as amended 6 May 2011);
- Conforms to the Major Command Civil Engineering Squadron Design Guide and Nellis AFB architectural compatibility guidelines to ensure a consistent and coherent architectural character throughout the Base; and
- Achieves the goals and objectives laid out in the *Nellis AFB Installation Development Plan*.

Description of Proposed Action and Alternatives

The EA evaluates the potential environmental impacts that may arise from installation development projects, which include construction of new facilities, renovation and repair of existing facilities, implementation of infrastructure improvements, and demolition of obsolete facilities. Alternatives 1 and 2 include multiple construction, renovation, repair, infrastructure improvement, and demolition activities. Alternative 1 includes substantially more new construction and demolition activities, while Alternative 2 is more focused on renovation of existing facilities. **Table 1** summarizes the actions that would occur under Alternatives 1 and 2.

Based on **Table 1**, the net impervious coverage for Alternative 1 would increase by 24,599 ft² (Note: This includes the square footage for demolition, construction, and pavement of new roads). The net impervious coverage for Alternative 2 would increase by 265,805 ft².

Table 1
Summary of Alternatives

Activity	Alternative 1	Alternative 2
Demolition		
Number of actions	9	2
Demolition amount	457,457 ft ²	174,540 ft ² demolished
Renovation Only		
Number of actions	0	7
Renovation amount	0	282,934 ft ² renovated
Building Construction		
Number of actions	8	8
New construction	70,465 ft ² 1,700 LF of walls/gates	55,754 ft ² constructed 1,700 LF walls/gates 10,700 ft ² renovated
Additions to Buildings		
Number of actions	7	7
Project totals	32,014 ft ² renovation 29,300 ft ² new construction (additions)	32,014 ft ² renovation 29,300 ft ² new construction (additions)
Infrastructure Construction		
Number of actions	8	8
New construction	21,600 ft ² facilities construction 285,091 ft ² new impervious surfaces 27,040 LF new fencing 75,600 ft ² new access road	21,600 ft ² facilities construction 285,091 ft ² new impervious surfaces 27,040 LF new fencing 75,600 ft ² new access road

Note:
ft² = square feet, LF = linear feet

Project initiation would occur over the six-year period fiscal year (FY) 2025–FY 2031. The construction schedule for each proposed building is roughly 12 to 18 months and dependent on the timing of the design schedule relative to the weather cycle of the region. Infrastructure construction could range from 8 to 12 months depending on the timing of its design schedule relative to the weather cycle of the area.

Alternative 1 (Proposed Action)

Under Alternative 1, there would be nine demolition projects, eight building construction projects, seven additions to buildings projects, and eight infrastructure construction projects. Some of the construction projects would also include some renovation or some demolition actions. Under Alternative 1, all proposed projects would meet the selection standards, remedy facility deficiencies, be consistent with land use requirements, increase operational efficiencies and promote sustainable development, and improve the quality of life.

Alternative 2

Under Alternative 2, there would be two demolition projects, seven renovation-only projects, eight building construction projects, seven additions to buildings projects, and eight infrastructure construction projects. Under Alternative 2, all of the proposed projects would meet the selection standards, remedy facility deficiencies; be consistent with land use requirements, force protection, and planning concept; minimize operational inefficiencies and promote sustainable development; and improve the quality of life.

No Action Alternative

Under the No Action Alternative, the proposed development projects for Nellis AFB would not occur. Activities that occur in existing facilities would continue to operate in substandard, congested, and geographically separated facilities; security requirements necessary for compliance with guidelines would not be met; aging facilities and infrastructure would require extensive and costly upkeep; and inefficient workarounds to meet mission requirements would continue. Failure to complete the needed installation development would degrade the Base's mission.

Summary of Findings

Potentially affected environmental resources were identified through communications with state and federal agencies and review of past environmental documentation. Specific environmental resources with the potential for environmental consequences include noise; safety; air quality; biological resources; water resources; geological resources; land use; socioeconomics; environmental justice and protection of children; cultural resources; hazardous materials and wastes, toxic substances, and contaminated sites; and infrastructure, transportation, and utilities.

Noise associated with construction, demolition, and renovation projects proposed under Alternatives 1 and 2 would not be anticipated to result in any significant direct or indirect impacts on noise-sensitive receptors. There would be no operational increases in noise resulting from implementation of the Proposed Action. No permanent changes to the noise environment would occur under implementation of Alternative 1 or Alternative 2.

No impacts to ground, flight, or explosive safety quantity distance arcs would occur. Short-term, negligible-to-minor, adverse impacts on contractor health and safety would be anticipated to result from proposed construction and demolition projects under Alternatives 1 and 2. All construction contractors at Nellis AFB would be required to follow ground safety regulations and worker's compensation programs to avoid posing any risks to workers or personnel on or off Base.

The effects of Alternatives 1 and 2 on regional air quality would be expected to be minor. The estimated project emissions for projects implemented under these alternatives would not be anticipated to result in significant emissions of criteria pollutant air emissions, and thus, no adverse impacts would be expected.

Due to the lack of intact native vegetation in the areas designated for development under Alternative 1 and the minimal vegetation clearing associated with construction, demolition, and renovation activities that would occur, no significant impacts to vegetation would be anticipated to occur under the implementation of Alternative 1. The noise and movement temporarily caused by construction, demolition, and renovation activities is anticipated to have negligible, short-term impacts on wildlife. Implementation of Alternative 1 would result in no significant impacts to special status species, as ground disturbance related to the proposed projects would occur primarily in areas with existing development. None of the construction, demolition, or renovation projects associated with Alternative 1 have the potential to directly impact invasive species. Impacts to biological resources would be anticipated to occur in a reduced capacity under Alternative 2 due to the comparatively reduced amount of construction and demolition that would occur.

No significant impacts to water resources would be expected under the Proposed Action, although surface water and stormwater have the potential to be affected by any construction or demolition projects due to water contamination or runoff from project materials. Military construction, building additions, and road construction projects proposed under Alternatives 1 and 2 would increase paved areas on Nellis AFB, potentially increasing run-off. Best management practices would be implemented during construction to prevent stream degradation by sedimentation and erosion.

Implementation of the Proposed Action would have the potential to impact groundwater. Because groundwater resources in the Las Vegas Valley range from 300 to 1,500 feet below the ground surface, any contamination likely would be filtered by the thick layers of clay and fine-grained sediments before reaching aquifer depths. While the 100-year floodplain lies within the southern portion of the Base, none of the proposed project areas would be located within the identified floodplain.

Ground surface disturbance from military construction, road construction, building additions, and infrastructure improvements projects proposed under Alternative 1 and Alternative 2 would include activities such as clearing, grading, excavating, and recontouring of soils, which present the risk of potential short- and long-term increased soil erosion and sedimentation (the transport of eroded sediment). Military construction, building additions, and road construction projects proposed under Alternatives 1 and 2 would increase paved areas on Nellis AFB.

Land use on Nellis AFB would not be negatively impacted under the implementation of Alternative 1 or Alternative 2. Construction, demolition, and renovation activities associated with Alternatives 1 and 2 would occur entirely within the existing boundaries of Nellis AFB. The proposed projects would be implemented in areas of existing land use including airfield operations, industrial, training, community space, and community commercial.

No impacts to the local or regional population would occur under implementation of the Proposed Action. Under Alternatives 1 and 2, construction of new buildings and additions, demolition, and renovation of existing buildings would result in a temporary increase of construction personnel, depending on the number of projects occurring at one time. This temporary increase would have no impact on the socioeconomic condition on the region.

Under implementation of the Proposed Action, the proposed construction, demolition, and renovation projects would not result in a disproportionate impact on minorities, low-income, and youth populations. The activities proposed under Alternatives 1 and 2 would not disproportionately affect the availability of these resources to minorities, low-income populations, or children.

No archaeological resources on Nellis AFB have been identified as eligible or potentially eligible for listing on the National Register of Historic Places (NRHP), and all projects proposed under Alternatives 1 and 2 would occur on land that has been previously disturbed. Standard operating procedures for the inadvertent discovery of archaeological resources or human remains detailed in the Integrated Cultural Resources Management Plan would be followed should any such discoveries occur. There would be an adverse effect to the buildings associated with the Lomie Gray Heard School District. However, the buildings were previously mitigated through documentation at the national level. The Nevada State Historic Preservation Officer (SHPO) agreed with this finding via letter dated 15 July 2024 (see **Appendix A** to the EA).

Short-term, negligible-to-minor, adverse impacts would be anticipated to result from the use of hazardous materials and petroleum products during construction, demolition, and renovation projects associated with Alternatives 1 and 2. No impacts to fuel storage would occur under Alternatives 1 or 2. No impacts on Environmental Restoration Program sites would be anticipated under implementation of Alternative 1 or Alternative 2. Lead-based paints, while no longer used at Nellis AFB, may be present in buildings proposed for demolition and renovation. Lead-based paint and asbestos removal and disposal would be conducted in accordance with federal, state, and local regulations. Removal and proper disposal of light fixtures containing polychlorinated biphenyls is a potential long-term, minor, beneficial impact under Alternatives 1 and 2.

Under Alternatives 1 and 2, no new personnel would be permanently added to the Nellis AFB workforce. As such, there would be no appreciable change in demand for utilities (i.e., electricity, sewer, natural gas). New facility construction would likely employ new energy-efficient hot-water boilers and cooling systems to reduce the impact on the existing electrical infrastructure. Any effect on the availability of groundwater and drinking water at Nellis AFB or in the surrounding areas would be minimal and would be well below the Base's allotment. Nellis AFB would not need to seek additional water rights. However, it is noted that the current drought has diminished the availability of water in Nevada and the broader region as a whole. Alternatives 1 and 2 would not be anticipated to appreciably increase the strain on existing water resources. With no increase in personnel, no impacts to transportation resources would not be anticipated.

Cumulative Impacts

The EA considered cumulative impacts that could result from the incremental impact Alternatives 1 and 2 when added to other past, present, or reasonably foreseeable future actions. No potentially significant cumulative impacts were identified for Nellis AFB.

Mitigation

There would be an adverse effect to the buildings associated with the Lomie Gray Heard School District. Nellis AFB has determined that no further mitigation is necessary for this undertaking beyond the 2022 *Memorandum of Agreement Between the United States Air Force and the Nevada State Historic*

Preservation Officer Regarding the Demolition of Lomie Gray Heard School, Located on Nellis Air Force Base, Clark County, Nevada, and that the buildings were previously mitigated through documentation at the national level. The SHPO agreed with this finding via letter dated 15 July 2024 (see **Appendix A** to the EA). No additional mitigation is required and thus no mitigation plan was developed.

The EA analysis concluded that neither Alternative 1 nor 2 would result in any other significant environmental impacts; therefore, no additional mitigation measures are required. Best management practices are described and recommended in the EA where applicable.

Conclusion

Finding of No Significant Impact. After review of the EA prepared in accordance with the requirements of NEPA, CEQ regulations, and 32 CFR Part 989, and which is hereby incorporated by reference, I have determined that the proposed activities would not have a significant impact on the quality of the human or natural environment. Accordingly, an Environmental Impact Statement will not be prepared. This decision was made after considering all submitted information, including a review of agency comments submitted during the 30-day public comment period, and considering a full range of practical alternatives that meet project requirements and are within the legal authority of the U.S. Air Force.

The DAF is aware of the November 12, 2024 decision in *Marin Audubon Society v. Federal Aviation Administration*, No. 23-1067 (D.C. Cir. Nov. 12, 2024). To the extent that a court may conclude that the Council on Environmental Quality (CEQ) regulations implementing NEPA are not judicially enforceable or binding on this agency action, the DAF has nonetheless elected to follow those regulations at 40 C.F.R. Parts 1500– 1508, in addition to the DAF's procedures/regulations implementing NEPA at 32 CFR 989, to meet the agency's obligations under NEPA, 42 U.S.C. §§ 4321 et seq.

JASON J. GLYNN, Colonel, USAF
Commander

DATE